

EXHIBIT B

SECURITIES AND EXCHANGE
COMMISSION,

V.

and

Relief Defendant.

ECF CASE

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4) I am not available to testify on October 11, 12, or 15-17, 2012. I will be on a previously planned business trip in Bermuda between October 11-15, and have client commitments that would be burdensome to alter on October 16 and 17, 2012.

5) Requiring me to appear in New York City to testify on the dates on which I am unavailable, as set forth above, would subject me to undue burden and expense.

6) Accordingly, I seek an order from the Court protecting me from testifying on the foregoing dates on which I am not available.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Boston, Massachusetts
September 28, 2012


Robert Dame